

THE LAW FIRM OF
CÉSAR DE CASTRO, P.C.
ATTORNEY AT LAW

The District
111 Fulton Street - 602
New York, New York 10038
631.460.3951 Office
646.285.2077 Mobile
646.839.2682 Facsimile
cdecastro@cdecastrolaw.com
cdecastrolaw.com

June 14, 2023

Via ECF

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Jordan, et al.*, 20 Cr. 305 (LDH)

Dear Judge Hall,

We write to appraise the Court of a scheduling conflict with the trial date set by the Court. We represent Jay Bryant who was recently added to the case in the superseding indictment filed on May 30, 2023. He is scheduled to be arraigned on Friday June 16, 2023.

We have been representing Mr. Bryant, pursuant to the Criminal Justice Act, in a matter pending before the Honorable Brian M. Cogan since November 2022, for which he has been detained since July 2022. That matter is scheduled for trial on January 29, 2024 (with a backup date of December 18, 2023), the same date for which this trial is scheduled.

Even if Mr. Bryant's older case on which he has been detained for approximately one year were adjourned to accommodate this case, we will not have sufficient time to effectively prepare for trial due to our current obligations in other matters. I am currently preparing for a complex international narcoterrorism trial, a case in which the current president of Venezuela is charged, that will begin on July 10, 2023, in the U.S. District Court for the Southern District of New York. *See United States v. Nicolas Maduro Moros et. al.*, 11 Cr. 205 (AKH). The government's case is expected to last three weeks. Following that trial in July, we are scheduled to begin another trial in the Southern District of New York on September 11, 2023. *See United States v. Joshua Schulte*, 17 Cr. 548 (JMF). Finally, on either February 5, 2024, or February 12, 2024, we are scheduled to begin trial before Judge Vitaliano in *United States v. Chen, et. al.*, 22 Cr. 158 (ENV). Based on the amount of preparation and investigation we will need to adequately represent Mr. Bryant at trial, and our trial schedule for the remainder of 2023 and early 2024, I believe a January 29, 2024 trial date for Mr. Bryant is not feasible.

Furthermore, based on our review of the prior filings and procedural history in this case, it appears that Mr. Bryant and his co-defendants may pursue antagonistic defenses, whereby severance may be necessary. As such, we are requesting that, as to Jay Bryant, the January 29, 2024 trial be adjourned.

Respectfully submitted,

/s/

César de Castro
Shannon McManus

cc: All Parties (*via* ECF)